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13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA, SOUTHERN DIVISION**

15 BAO-TRAN ABBIE NGUYEN, an
16 individual,

17 Plaintiff,

18 vs.

19 STATE FARM MUTUAL AUTOMOBILE
20 INSURANCE COMPANY, a Foreign
21 corporation, DOE EMPLOYEES I-V, and
22 ROE COMPANIES I-V,

23 Defendants.

CASE NO.: 2:21-cv-00282-JAD-VCF

**STIPULATION AND ORDER TO DISMISS
THE SECOND, THIRD AND FOURTH
CAUSES OF ACTION AND PARAGRAH NO.
5 OF THE PRAYER FOR RELIEF FOR
PUNITIVE DAMAGES (PG. 9, LINE 11) OF
THE COMPLAINT WITHOUT PREJUDICE**

AND

REMAND TO STATE COURT

ECF No. 11

24 IT IS HEREBY STIPULATED by and between Plaintiff BOA-TRAN ABBIE NGUYEN, an
25 individual, by and through her counsel of record. GABRIEL CZOP, ESQ., and JOSEPH ORTUNO,
26 ESQ., of the VAN LAW FIRM, and Defendant STATE FARM MUTUAL AUTOMOBILE
27 INSURANCE COMPANY, by and through its counsel of record, ROBERT W. FREEMAN, ESQ.,
28 PAMELA L. McGAHA, ESQ., and E. MATTHEW FREEMAN, ESQ., of LEWIS BRISBOIS
BISGAARD & SMITH, LLP, hereby stipulate and agree as follows:

IT IS HEREBY STIPULATED that Plaintiff's second, third and fourth causes of action
against Defendant, contained in her Complaint and Demand for Jury Trial shall be dismissed without
prejudice.

IT IS HEREBY FURTHER STIPULATED that Paragraph No. 5 of the Prayer for Relief
for punitive damages (Pg. 9, line 11) of the Complaint and Demand for Jury Trial on file herein shall

1 be dismissed without prejudice.

2 **IT IS HEREBY FURTHER STIPULATED** that this matter be remanded to the Eighth
3 Judicial District Court in Clark County, Nevada.

4
5 DATED this 4th of May, 2021.

6 **VAN LAW FIRM**

7
8 /s/ Gabriel Czop

9 GABRIEL CZOP, ESQ.

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19 *Attorneys for Plaintiff Bao-Tran Abbie*
20 *Nguyen*

DATED this 4th of May, 2021.

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Attorneys for Defendant State Farm Mutual
Automobile Insurance Company

17 **ORDER**

18
19 Based on the parties' stipulation [ECF No. 11] and good cause appearing, IT IS HEREBY
20 ORDERED that Plaintiff's second, third and fourth causes of action, and paragraph 5 of the prayer
21 for relief are DISMISSED without prejudice. Because federal jurisdiction is now lacking, IT IS
22 FURTHER ORDERED that this case is REMANDED back to the Eighth Judicial District Court
23 Case No. A-21-827498-C, Department 5, and the Clerk of Court is directed to CLOSE THIS
24 CASE.

25
26 
27 U.S. District Judge Jennifer A. Dorsey
28 Dated: May 11, 2021